



United States Environmental Protection Agency's Update on the Compliance Status of the Torrance Refining Company

The United States Environmental Protection Agency has completed inspections at the Torrance Refinery in Torrance, CA under several applicable environmental programs. These inspections were conducted to assist local and state regulatory agencies in determining facility compliance and to ensure that the Torrance Refinery is meeting its regulatory obligations. Several other federal, state and local agencies are conducting inquiries including the Chemical Safety Board, Cal/OSHA, the California Department of Toxic Substances Control and the South Coast Air Quality Management District. This fact sheet summarizes U.S. EPA's preliminary findings. These findings are the first step in determining compliance. The Torrance Refinery will have the opportunity to provide additional information before a final determination will be made.

Clean Air Act 112R Inspection

Conducted November 1-4, 2016 with the Torrance Fire Department. The inspection was primarily focused on the Torrance Refining Company's (TRC) implementation of their Risk Management Program under the Clean Air Act Section 112(r) – Prevention of Accidental Releases, the TRC's Offsite Consequence Analysis and the operation of TRC's Hydrofluoric Acid Alkylation Unit. The Chemical Accident Prevention Program's goal is to reduce chemical risks at the local level. This is done by preventing, to the greatest extent possible, the consequences of a catastrophic release of toxic, reactive, flammable or explosive chemicals.

Refinery Processes Covered during the Inspection

Use of hydrofluoric acid (HF) in the Alkylation Unit process. The alkylation unit in the Torrance refinery uses HF as a catalyst in a reaction to produce an 'alkylate', a high-octane gasoline component that is blended to produce gasoline.

Preliminary Findings

1. Torrance Refinery's toxic worst case scenario analysis of the off-site impacts of accidental releases of hazardous chemicals does not meet the regulatory requirements of 40 CFR Part 68.
2. Process safety information was not included in the labeling of critical equipment. Torrance refinery failed to follow design codes and standards and generally accepted good engineering practices in the labeling of vessels containing hydrofluoric acid.
3. Piping and instrument diagrams did not accurately reflect the design of specific chemical processes in the hydrofluoric acid alkylation unit.
4. Critical safety systems in the hydrofluoric acid alkylation unit were not being tested at the frequencies that were prescribed by the TRC's own procedures.

Next Steps

EPA has requested additional information from the Torrance Refining Company related the chemical accident prevention program. TRC has 30 days to provide the requested information. Once EPA has evaluated that information the agency will make final compliance determination. After EPA has evaluated all of the information from TRC, EPA will make a final compliance determination.

Resource Conservation and Recovery Act Inspection

Conducted December 5-8, 2016 with the Department of Toxic Substances Control. The Resource Conservation and Recovery Act (RCRA) was enacted to protect human health and the environment from the potential hazards of waste disposal, to reduce the amount of waste generated and to ensure that wastes are managed in an environmentally sound manner.

Preliminary Findings

1. 329 bins of RCRA listed hazardous wastes on site for more than 1 year.
2. Storage of emulsified layer material skimmed off of the API separator (RCRA K049 hazardous waste) in two on-site tanks without a permit.
3. Storage of float from the gas flotation unit (RCRA K048 hazardous waste) in an in-ground concrete pit without a permit.
4. Management of heat exchanger bundle cleaning sludge (RCRA K050 hazardous waste) on a concrete pad without a permit.

Next Steps

EPA and the California Department of Toxic Substances Control are coordinating additional compliance actions under RCRA Subtitle C.

Clean Air Act National Emissions Standards for Hazardous Air Pollutants Inspection

Conducted November 28, 2016 with the South Coast Air Quality Management District. The Clean Air Act – National Emissions Standards for Hazardous Air Pollutants (NESHAPs) was enacted to establish standards, notification, emission testing, monitoring, record keeping and reporting requirements for hazard air pollutants such as asbestos, benzene, fugitive emissions and mercury.

Major Findings

South Coast AQMD issued a Stipulated Order for Abatement signed on 2/21/17 under local Air District Rule 402 and California H&S Section 41700. Additional compliance issues are under review.

Next Steps

The SCAQMD is taking additional compliance actions.



Torrance Refining Company